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November 27, 2006

Elaine M. Coley
6321 Sandy Ridge Curve
Montgomery, AL 36117

Re: *Elaine M. Coley v. Alabama Medicaid Agency; In the United States District Court for the Middle District of Alabama Northern Division; CV-06-378.*

Dear Ms. Coley:

Thank you for your telephone call this morning. As I told you on the phone, I did receive your e-mailed interrogatory and production responses. However, your production response indicating that "Documents for production that apply are in possession of the defendants" is not sufficient. When we discussed this on the phone, you indicated that you thought Medicaid would have all of the documents that you would produce in response to the production requests. However, the purpose of the production requests is to determine what documents you have that are relevant to this lawsuit. I have already allowed 14 days of additional time to respond to the Interrogatories and Production Requests. Please provide your production responses consistent with the Rules of Federal Procedure no later than Wednesday at 5:00 p.m. As we have discussed several times, I must have this information well in advance of your deposition Friday so that I may prepare for it. If you do not properly respond to the Production Requests, I will have no choice but to seek the Court's assistance in obtaining your responses.

Very truly yours,

WILKERSON & BRYAN, P.C.



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